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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. 3:22-CR-00401-JD
	)	
Plaintiff,	)	STIPULATION TO SET CHANGE OF PLEA AND
	)	EXCLUDE TIME FROM MARCH 28, 2023 TO
v.	)	APRIL 17, 2023 AND <del>[PROPOSED]</del> ORDER
	)	
JACE WONG,	)	
a/k/a Robyn Wong	)	
	)	
Defendant.	)	
	)	

A status conference is currently set for April 3, 2023 at 10:30 AM. Counsel for the United States and counsel for the defendant, Jace Wong, are working on a resolution and stipulate that the status conference should be vacated, and a change of plea should be set for April 17, 2023. The parties also stipulate that time be excluded under the Speedy Trial Act from March 28, 2023 through April 17, 2023.

The government and counsel for the defendant agree that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare and discuss the discovery and resolution with the defendant. For this reason, the parties stipulate and agree that excluding time until April 17, 2023 will allow for the effective preparation of counsel. See 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further

STIPULATION TO EXCLUDE TIME AND ~~[PROPOSED]~~ ORDER  
Case No. 3:22-CR-00401-JD

1 stipulate and agree that the ends of justice served by excluding the time from March 28, 2023 through  
2 April 17, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and  
3 the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
5 counsel for the defendant to file this stipulation and proposed order.

6  
7 IT IS SO STIPULATED.

8 DATED: March 28, 2023

\_\_\_\_\_  
/s/  
KELSEY C. DAVIDSON  
Assistant United States Attorney

10  
11 DATED: March 28, 2023

\_\_\_\_\_  
/s/  
DOUGLAS HORNGRAD  
Counsel for Defendant Jace Wong

12  
13 ~~PROPOSED~~ ORDER

14 Based upon the facts set forth in the stipulation and for good cause shown, the Court finds that  
15 failing to exclude the time from March 28, 2023 through April 17, 2023 would unreasonably deny defense  
16 counsel and the defendant the reasonable time necessary for effective preparation, taking into account the  
17 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice  
18 served by excluding the time from March 28, 2023 through April 17, 2023 from computation under the  
19 Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore,  
20 and with the consent of the parties, IT IS HEREBY ORDERED that the time from March 28, 2023 through  
21 April 17, 2023 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A),  
22 (B)(iv). The Court also orders that the April 3, 2023 status conference is vacated and a change of plea is  
23 set for April 17, 2023.

24 IT IS SO ORDERED.

25  
26 DATED: March 29, 2023

\_\_\_\_\_  
JAMES J. DONATO  
United States District Judge